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“Ecoterrorism”: Terrorist Threat or Political Ploy?

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This article examines the phenomenon of “ecoterrorism” from a conceptual and empirical perspective. We explore the political and academic debates over the meaning and use of the term ecoterrorism, and assess the validity of the concept of “ecoterrorism” and of the alleged threat of the Radical Environmentalist and Animal Rights (REAR) movement by analyzing the characteristics of both the movement and its actions. Our analysis shows that the term ecoterrorism should only be used for a small proportion of the actions of REAR movement. Consequently, counterterrorist measures should only target these terrorist minorities, rather than all groups and the broader movement.

In his testimony to the Senate Select Committee on Intelligence, less than half a year after the terrorist attacks of 11 September 2001 (9/11), executive assistant director of the Counterterrorism/Counterintelligence Division of the Federal Bureau of Investigation (FBI), Dale Watson, declared:

During the past decade we have witnessed dramatic changes in the nature of the terrorist threat. In the 1990s, right-wing extremism overtook left-wing terrorism as the most dangerous domestic terrorist threat to the country. During the past several years, special interest extremism—as characterized by the Animal Liberation Front (ALF) and the Earth Liberation Front (ELF)—has emerged as a serious terrorist threat.¹

According to a (later published) FBI Terrorism Report, “the majority of domestic terrorism incidents between 1993 and 2001 were attributable to the left-wing special interest movements the ALF and the ELF.”² In 2004, his colleague John Lewis, deputy assistant director of the FBI Counterterrorism Division, went even further in his testimony to the

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Senate Judiciary Committee, declaring: "In recent years, the Animal Liberation Front and the Earth Liberation Front have become the most active criminal extremist elements in the United States," and "the FBI's investigation of animal rights extremists and *ecoterrorism* matters is our highest domestic terrorism investigative priority" (emphasis added).³

To most Americans, this statement, if it had been given serious attention by the U.S. media, would have come as a surprise. Having been bombarded with articles and public warnings about "*Jihadist* terrorism" ever since 9/11, the average American would not have expected the primary domestic terrorist threat to come from "ecoterrorist" groups like the ALF and ELF, which are largely unknown to the broader public. In fact, the statement would have likely stunned most academic scholars of political violence and terrorism, who until recently have devoted little attention to the phenomenon.⁴ Even the report, *Who Becomes a Terrorist and Why? The 1999 Government Report on Profiling Terrorists*,⁵ which reflects the terrorism focus of the U.S. government pre-9/11, does not once mention the ALF or ELF. Similarly, no "ecoterrorist" group is included in the lists of terrorist organizations of the European Union (EU) or the United Kingdom.⁶

This article assesses the phenomenon of ecoterrorism from a conceptual and empirical perspective. We start out with concise overviews of the political and academic debates over the meaning and use of the term ecoterrorism. We then assess the validity of the concept of "ecoterrorism" and of the alleged threat of the Radical Environmentalist and Animal Rights (REAR) movement, by analyzing the characteristics of the movement and its actions. Our analysis shows that the term ecoterrorism should only be used for a small proportion of specific actions of the REAR movement, which are perpetrated by a tiny minority of extreme individuals (nominally organized in "groups") within the broader movement. In the conclusion we discuss the consequences of this finding for both academic and political discussions about the REAR movement and ecoterrorism.

The Political Debate

While the exact origins of the term ecoterrorism are unclear, Ron Arnold, executive vice-president of the Center for the Defense of Free Enterprise (CDFE), claims to have coined the term in a 1983 article in the libertarian monthly *Reason*, defining it as "a crime committed to save nature."⁷ Arnold is one of the most active and influential critics of environmentalism in the United States; he has written books like *Ecoterror: The Violent Agenda to Save Nature*,⁸ consults and lobbies for industries criticized by the environmentalist movement, and is the self-acclaimed founder of the anti-environmental "Wise Up Movement," which promotes the expansion of private property and deregulation of publicly held property.⁹

Within just a few short years the term ecoterrorism had become broadly used in conservative and libertarian circles and the focus of much discussion in Washington. The first congressional hearing employing the term ecoterrorism was held before the House of Representatives in June 1998, and was titled "Acts of Eco-Terrorism by Radical Environmental Organizations."¹⁰ Conservative politicians organized additional hearings on the topic of REAR activism in which the term ecoterrorism became regularly used to describe their activities. At the same time, there was a concerted effort, largely coordinated by the American Legislative Exchange Council (ALEC), to introduce legislation targeting "ecoterrorism" and the larger REAR movement at both the state and federal level.¹¹ The first prominent federal law was the Animal Enterprise Protection Act (AEPA), signed into law by President George H.W. Bush in August 1992, which created the federal crime of "animal enterprise terrorism."

The passage of the USA PATRIOT Act, in response to the 9/11 attacks, redefined terrorism (in general) to include acts of property destruction, enabling potentially harsher sentencing of activists who engage in arson and vandalism in the name of causes such as environmental and animal rights.¹² As a result, FBI officials started to describe groups that engaged in these actions as “ecoterrorists” and to consider them as a domestic terror investigation priority. In a 2002 speech before the House Resources Committee, FBI Domestic Terror Section Chief James Jarboe defined ecoterrorism as “the use or threatened use of violence of a criminal nature against innocent victims or property by an environmentally-oriented, subnational group for environmental-political reasons, or aimed at an audience beyond the target, often of a symbolic nature.”¹³ In line with this shift, the AIEA was revised and renamed the Animal Enterprise Terrorist Act (AETA), and signed into law by President George W. Bush in November 2006. This change reflected “the trend away from passively protecting animal enterprises toward aggressively prosecuting animal activists.”¹⁴

Today the term ecoterrorism has become mainstream within the U.S. intelligence and legislative communities, meeting only incidental opposition by politicians.¹⁵ And, despite fierce opposition from the broader environmentalist and animal rights communities, the term is widely used in the mainstream U.S. media too.¹⁶ Due to concerted efforts by a broad economic and political coalition, including lobbyists and representatives of the main targeted industries (e.g., agribusiness, food industry, pharmaceutical industry), “ecoterrorism” has become synonymous with the REAR movement. This includes non-criminal organizations like People for the Ethical Treatment of Animals (PETA), and even the moderate environmentalist and animal rights movement. This is not only visible in the more general “ecoterrorism” legislation, but also in the public campaigns of the anti-REAR camp.¹⁷

Interestingly, the term has not caught on outside of the U.S. borders. Linguistic equivalents of ecoterrorism are seldom used in the public debates of Western Europe, not even in countries that have an active REAR movement. For example, the Dutch General Intelligence and Security Service (AIVD) has published several reports on the Dutch radical animal rights movement in the first decade of the twenty-first century. It reflected its observation of growing radicalization within the movement by changing the overall term from “animal rights activism” (2004) to “animal rights extremism” (2007), explicitly following the British terminology and rejecting the U.S. terminology of “terrorism.”¹⁸ The German Federal Office for the Protection of the Constitution (BfV) does not even focus specifically on “ecoextremism” in its annual reports. As far as the term ecoterrorism (or its linguistic equivalents) turns up in the public debate, it is almost exclusively with regard to the discussion in the United States.

The Academic Debate

The REAR movement is seldom mentioned in studies on terrorism,¹⁹ political violence,²⁰ counterterrorism,²¹ and state repression.²² If referenced, it is mostly in the fairly ambiguous category of “single-issue terrorism,” which often includes everything not captured by the other substantial categories (including, for example, both “anti-abortion” and “militant suffragette”), and negates the ideological basis of the REAR movement (see below).²³ Only a few general studies include a (very short) section on “ecoterrorism,”²⁴ while most specific studies focus exclusively on the animal rights movement (or the ALF).²⁵

Although the REAR movement has not been the primary focus of many academic studies, the term ecoterrorism has made, slowly but steadily, inroads into the academic debate. In the 1980s and 1990s the term was virtually only referenced in legal studies

published in law reviews. The first social science study on the topic was published in *Studies in Conflict & Terrorism* in 1996, entitled “From Spikes to Bombs: The Rise of Eco-Terrorism.”²⁶ Since then, ecoterrorism has remained a relative fringe topic in terrorism studies, hardly meriting more than a tiny section in encyclopedias and textbooks, and rarely being the main focus of articles or books.²⁷ In contrast, there is much more interest in ecoterrorism among (U.S.) legal scholars; particularly in the specific legal measures targeting the REAR movement.²⁸

The term ecoterrorism is strongly contested within academia. A majority of authors argue that the term does not accurately capture the movement; REAR activists have not (yet) risen to the level of terrorism, which makes the term a (dangerous) misnomer.²⁹ In contrast, a minority in the field, interestingly including several of the (few) scholars who have actually studied the movement in detail,³⁰ do believe that ecoterrorism is an accurate term to denote the REAR movement. This includes scholars who have focused on identifying the risks of ecoterrorism, even if they do not spend much time discussing the accuracy of the concept.³¹

Most scholars do agree that the REAR movement has been responsible for a large number of illegal actions, most notably in the United Kingdom and United States. There is also broad consensus on the list of illegal actions that the movement is responsible for—although a small group of sympathetic scholars³² exclude all actions that are not in line with the movement’s official nonviolence policy (see also below). Leaving aside moral arguments against the term ecoterrorism,³³ the core of the academic debate comes down to three main bones of contention: (1) the definition of *violence*, (2) the issue of *intent*, and (3) the role of *fear*.

The most hotly debated issue centers on the definition of the term violence and, more specifically, whether destructive acts against property are violent acts. For many authors illegal acts like “ecotage” and “monkeywrenching” are part of “nonviolent resistance.”³⁴ They argue that “[i]t is wrong to call a group which directs action only at property, a terrorist group.”³⁵ These scholars hold that acts are only violent (rather than illegal) when they target human beings³⁶ or, in the terms of the movement, “sentient beings.”³⁷ They argue that lowering the threshold for terrorism to include acts against property also contradicts the understandings of some academics and individuals in radical movements, who have engaged in a “longstanding debate over property destruction and its validity as a form of non-violent protest.”³⁸

Most scholars who approve of the term ecoterrorism do so implicitly, often uncritically following the official FBI definition. Seemingly agreeing, Rik Scarce³⁹ states that for authorities and practitioners of civil disobedience, property destruction is “violence, plain and simple.” Taking an extreme position, Luther Tweeten⁴⁰ believes that “animal rights advocates stop at almost nothing to further their cause.” This position is based on a rather radical philosophical position, namely that, for many persons, property is an extension of themselves and therefore, those who destroy property ultimately destroy people. More moderate, Donald Liddick⁴¹ argues that, although the stated position of the movement is that sentient beings are never targeted or harmed, in practice property destruction create substantial risks to human welfare. Finally, some authors point to an escalation in illegal actions, with the most extreme groups within the broader REAR movement targeting people for harassment and physical attacks, which warrants the use of the term ecoterrorism.⁴²

Related to the discussion about the definition of violence is the debate about the issue of intent. Following the official motto of groups like the ALF and ELF, various scholars state that the REAR movement has not yet *intentionally* brought harm to anyone, emphasizing the fact that the movement has never actually killed anyone.⁴³ Some, raising the bar even

further, argue that there is little evidence that the movement intends to kill or to foster “terror” among the general populace.⁴⁴ Still, even in this group, scholars point to signs that elements within the RAER movement are drifting toward greater levels of violence. For example, Gary Ackerman⁴⁵ sees definite indications of an erosion of the ALF’s existing restraints on causing harm to human beings, possibly moving to (truly) violent actions in the near future.

The third bone of contention is about the role of fear (and, related, terror), a vital feature of most definitions of terrorism.⁴⁶ Opponents of the term ecoterrorism contend that since property cannot feel fear, and therefore cannot be “terrorized,” damage to property is more accurately described as sabotage (or “ecotage”). They also hold that, given the absence of the random selection condition (i.e., targeting purposefully random civilian populations), a larger population is not suitably terrorized by the prospect of becoming the next victim. Not only are specific persons themselves not targeted, but ordinary people also need not even fear for their property.⁴⁷ Consequently, they conclude that the term ecoterrorism should not apply to “a whole lot of people doing nothing to terrify anyone.”⁴⁸

To accurately assess the validity of the various arguments, we have to address three crucial issues. First, we need to define the REAR movement, something that is rarely done in either academic, intelligence, or political studies.⁴⁹ Second, we must provide an overview of the types of actions that the movement is responsible for and assess their relative importance within the broader arsenal of actions of the whole movement. Third, and last, we have to assess the actions of the movement on the basis of a clear definition of ecoterrorism, while accepting that whatever definition we choose, it will be criticized by some scholars.

The Movement

The REAR movement is a broad and loosely organized amalgam of individuals, groups and organizations that condone radical (i.e., non-legal) actions to realize a world in which both animals and the environment are fully respected. Most of their radical actions are aimed at exposing or stopping environmental destruction and animal abuse. While all members of the REAR movement differ from the much larger moderate environmental and animal rights movement in terms of their acceptance of non-legal activities, some also have more radical political goals. For example, many radical animal rights activists believe that animals should have the same rights as humans, while many radical environmentalists believe that environmental concerns are more important than economic concerns. Although the various REAR groups do not constitute a single entity, “they are at the very least close cousins.”⁵⁰

The origins of the REAR movement can be traced back to the United Kingdom in the mid-1970s, when the growth of the (modern) animal rights movement accelerated.⁵¹ Dissatisfaction with the mainstream animal welfare movement soon led many activists to search for more aggressive methods. In 1976 the Animal Liberation Front (ALF) splintered from the less radical Hunt Saboteurs Association (HSA). Founder Ronnie Lee was frustrated with the conventional forms of activism and called for a more radical approach in which the ALF would carry out “direct action against animal abuse in the form of rescuing animals and causing financial loss to animal exploiters, usually through the damage and destruction of property.”⁵² The ALF does not have formal members or an organizational structure; anyone can be an ALF activist. However, the group sets clear limits to its actions. Anyone who wants to claim an action in the name of the ALF will have “to take all necessary precautions against harming any animal, human and non-human.”

By the mid-1980s, the initial 30 ALF activists had grown to more than 1,500⁵³ and expanded beyond the United Kingdom. In 1979 the ALF appeared in North America, when activists “liberated” animals from the New York University Medical Center.⁵⁴ Today, ALF actions are claimed throughout Europe and the Americas. While the ALF is still by far the most active group within the REAR movement, it is no longer the most radical. In 1982 the Animal Rights Militia (ARM) splintered from the ALF, rejecting the nonviolence principle. Since then some other groups have become involved in the targeting and threatening of humans suspected of involvement in animal abuse, such as the Justice Department and the Revolutionary Cells-Animal Liberation Brigade. Like the ALF, these groups hold that animals should have rights equal to those of human beings.

The radical environmentalist movement developed largely in tandem with the closely linked radical animal rights movement. It includes groups like Earth First! and the Earth Liberation Front (ELF), but also green anarchists, ecofeminists, Pagans and Wiccans, and anti-globalization and anti-capitalist protestors.⁵⁵ These groups differ widely over whether, how, and when there might be a reharmonization of life on Earth. Nevertheless, certain core beliefs, values, and practices make it possible to speak of “radical environmentalism” in the singular, as a complex and plural family (see below).⁵⁶

One of the first and most prominent radical environmental groups, Earth First!, was founded in the United States in 1979.⁵⁷ The founding members were all former mainstream environmentalists, who were fed up with the political system and believed that radical action was necessary to stop the environmental crisis.⁵⁸ Its main slogan is “no compromise in defense of mother earth,” and Earth First! neither condemns nor condones illegal acts of property destruction. However, in the 1990s some members became frustrated with the group’s unwillingness to actually engage in illegal actions to achieve its goals.⁵⁹ As a result, in 1992 British members formed the ELF, based on the ALF, which became active in North America four years later.

The ELF describes itself as “an international underground organization that uses direct action in the form of economic sabotage to stop the exploitation and destruction of the natural environment.”⁶⁰ Its activists call themselves “elves” to playfully evoke the sense that they are spirits of nature. On 19 June 1995, the first “Earth Liberation” action happened in Canada, by a group calling itself the Earth Liberation Army (ELA). They burned down a wildlife museum and damaged a hunting lodge in British Columbia.⁶¹ Since then the ELF has spread across the globe, most notable in the Americas and Europe, although, like the ALF, it does not officially exist as an organization and anyone, respecting their rules, can claim an action in its name.

Today the REAR movement is a highly diverse, international movement with an unknown number of activists and supporters worldwide.⁶² Cells can be found in at least 25 countries: Australia, Canada, France, Germany, Mexico, Netherlands, Sweden, the United Kingdom, and United States, to name just a few of the more active.⁶³ While radical environmentalists are more broadly focused on the entire ecosystem, radical animal rightists are concerned more narrowly with sentient beings.⁶⁴ Still, they regularly collaborate and claim joint responsibility for actions.⁶⁵ In fact, one of the most notorious activists, Rodney Coronado, worked hard to build bridges between radical environmentalist, animal liberationist, and anarchist sub-cultures, especially in North America.⁶⁶ For instance, both ALF and ELF claimed responsibility for setting fire to a building of the U.S. Department of Animal Damage Control in Olympia, Washington in 1998, while various (moderate and radical) animal rights groups have been collaborating in the extensive Stop Huntingdon Animal Cruelty (SHAC) campaign since 1989.⁶⁷

The ideology of the REAR movement comprises a rich stew of (sometimes conflicting) ideas and philosophies birthed from the zeitgeist of the 1960s, arguing that the prevailing power structures are victimizing minorities, women, and other marginalized groups.⁶⁸ Many environmental and animal rights activists adhere to (some of) the ideas of “deep ecology,”⁶⁹ which stresses biocentrism and equality of all species—human and nonhuman.⁷⁰ Among the most important publications within the REAR movement are Edward Abbey’s *The Monkey Wrench Gang* (1975), Peter Singer’s *Animal Liberation* (1975), Tom Regan’s *The Case for Animal Rights* (1983), and the collective *Ecodefense: A Field Guide to Monkeywrenching* (1985). While most activists believe that their goals can be achieved by a radical reform of the political system, the most extreme activists embrace anti-capitalist and anarchist ideas, and believe that only a true revolution can save the planet.

Despite the diversity of ideas and ideologies, there are three main characteristics that all activists and groups share: an uncompromising position, status as a grassroots organization, and direct action.⁷¹ In many ways, the REAR movement would be best described as an idea; it is a collectivity in the most limited and virtual sense.⁷² It acts as an inspiration to groups and activists, from the Americas to Europe and beyond, that work anonymously, either in small groups (i.e., autonomous cells of two to five people) or individually, and do not have a centralized organization or coordination. The activity of the network is decentralized and, on occasion, spontaneous. The glue that binds these local and international “franchises” together is their common goal of promoting the destruction of the assets of those who threaten the environment and all its sentient inhabitants.⁷³

The REAR movement, and many of its most active “groups” (like the ALF and ELF), lacks a hierarchical structure. Its organizational strategy is “leaderless resistance”; its activists remain largely faceless, nameless, and unconnected. Spokespersons, rather than the activists themselves, publicize the various direct actions committed by the group.⁷⁴ This leaderless resistance, which has reverted increasingly toward a “lone wolf” strategy since 9/11, allows activists to maintain a certain amount of anonymity, enhancing their chances of avoiding detection.⁷⁵ More importantly, this structure is less constrained by geographic boundaries, which allows activists to become activists of the movement simply by carrying out uncoordinated illegal actions on its behalf.⁷⁶ Because, rather despite, of its decentralized “franchise” structure the REAR movement is able to mobilize a large network of activists and supporters and inflict immense financial damage on its enemies.

Allowing the activists to control their own destiny, it maintains a high degree of connectivity to other environmental and animal rights organizations. There are several indicators of relational bridges and significant overlap in personnel and support networks among REAR and related groups.⁷⁷ This includes also “aboveground” organizations that are more broadly accepted within the public, such as PETA. According to Scarce PETA is “a mouthpiece for ALF” and their relationship “exemplifies the mutually-supportive mix of organization/bureaucracy and decentralization/anarchy within the Animal Liberation movement.”⁷⁸

The Actions

In February 2002 executive assistant director of the Counterterrorism/Counterintelligence Division of the FBI, Dale Watson, estimated that “the ALF/ELF had committed approximately 600 criminal acts in the United States since 1996, resulting in damages in excess of 42 million dollars.”⁷⁹ Jennifer Carson and her colleagues,⁸⁰ drawing on twelve different datasets, counted a total of 1,069 criminal acts in the United States between 1970 and

2007. Add to that the acts in other countries, not to speak of the much more numerous non-criminal acts, and there is no doubt that the REAR movement is very active.

The high level of activity of the movement is partly a consequence of the broad arsenal of actions it employs. Even the criminal acts can be divided, for example, by type of attack, target, or weapon. In their study of the criminal acts in the United States, Jennifer Carson et al.⁸¹ distinguish five different types of “attacks”: assassinations, armed assaults, bombings/explosions, facility attacks, and unarmed assaults. This typology is somewhat different from the one Jean-Marc Flückiger developed in his study of radical animal rights actions in Switzerland from 2002 to March 2007.⁸² Following in part the categorization used by the movement itself, as published on the *Bite Back* website,⁸³ he distinguishes between arson attacks, animal liberation, sabotage and vandalism, and home visits.

Building on both, we developed a seven-type categorization scheme: arsons, assassinations, vandalism, house visits, animal liberations, bombings, and cybercrimes. We will shortly describe the different types of actions, and provide illustrative examples, before discussing the relative importance of each type within the broader action repertoire of the REAR movement. It is important to note, however, that categorization of actions is not always straightforward. On the one hand, many actions involve a combination of different types of acts (e.g., both animal liberation and sabotage), on the other hand, several individual acts can be part of the same action (e.g., a series of vandalisms by the same group on the same evening).

Arson attacks generally involve the torching of specific machinery or sites of alleged animal rights abuse or environmental destruction. Probably the most notorious, and costly, was the ELF’s arson of a 206-unit condominium complex in San Diego, California in 2003, with estimated damages of 20 million dollars. The group left a 12-foot banner at the site that read, “If you build it, we will burn it,” and was signed, “The E.L.F.s are mad.”⁸⁴ The ALF has mostly used arson to destroy laboratories involved in animal testing, though sometimes their activists have also targeted private property of companies and people linked to animal rights abuse. The most militant section of the REAR movement has even attacked individuals; for instance, in April 2013 ARM activists threw several firebombs into the house of a Swedish accountant linked to a mink farm.⁸⁵

Assassinations involve the (attempted) killing of human beings. The vast majority of individuals and groups within the REAR movement reject the harming of all sentient beings, including humans. Both ALF and ELF explicitly state that such actions cannot be claimed in name of their organization. In fact, most proponents emphasize that the movement has never killed anyone—one of their major arguments against the use of the term ecoterrorism. The few assassinations mentioned by scholars were the work of “lone wolves” with highly problematic links to the movement. For example, Ted Kaczynski, better known as the Unabomber, denies being part of the REAR movement and criticizes ALF and ELF activists for being primarily concerned with satisfying “their own psychological needs.”⁸⁶ And while Volkert van der Graaf was indeed an activist within the Dutch REAR movement, he claims to have killed Dutch right-wing populist politician Pim Fortuyn “to defend Dutch Muslims from persecution,” and has never mentioned environmentalist or animal rights concerns.⁸⁷

Vandalism is a very broad category, by and large referring to property destruction that does not involve arson. This ranges from relatively harmless acts that cause minor damage, like the destruction of circus posters or the spraying of slogans and “ALF” on butcher and fur shops, to more costly acts, such as the destruction of data and equipment during animal liberations in animal research labs.⁸⁸ For instance, in July 1989 the ALF raided a facility at Texas Tech University and smashed equipment, computers and records with an estimated

\$700,000 in damages.⁸⁹ Such acts are often referred to as “ecotage,” particularly within the movement (i.e., acts of sabotage to prevent environmental destruction and animal abuse).

House visits target individuals linked to environmental destruction or animal rights abuse in the privacy of their own home. They are quite controversial within the REAR movement itself.⁹⁰ House visits range from loud demonstrations outside of a private residence to (often implicitly threatening) phone calls. House visits are often accompanied by vandalism and (threatening) graffiti—for example, at a house visit to an employee of Huntingdon Life Sciences in California ALF activists painted the words “HLS SCUM” on the garage door, dumped a gallon of paint on the car in the driveway, and punctured three of the tires.⁹¹ Activists often target not just the individuals themselves, but also their family and friends, as well as other sites, such as the school of the children—where activists will hold signs with gruesome pictures to show the abuses in which the parents are involved. Swedish ARM activists were recently involved in a particularly macabre house visit, removing the gravestone of the parents of the target from the cemetery and placing it in the garden of his sister, because “she has the power to affect Knut in his decision on the mink farm.”⁹²

Animal liberations are the trademark activity of the ALF and the main act that the radical animal rights movement advertises in its propaganda. Richard “Ric” O’Barry, the trainer of the original dolphins of the TV series *Flipper*, is often credited with the first act of animal liberation in North America, setting free two dolphins. The first highly publicized action in North America was the liberation of 469 animals, including the five-week-old macaque (monkey), Britches, from an animal testing facility of the University of California, Riverside in April 1985. It was one of the first large ALF actions in the United States and the video they shot of the action was later distributed and publicized by PETA and generated a lot of positive attention to the group.⁹³ To counter the negative media associations of the masked activists of the ALF a so-called “open rescues” movement has emerged, which involves animal liberations by non-masked people.

Bombings involve the threat or actual use of explosives; excluding the use of firebombs, which are included in arsons. Actual bombings are rare. More often, REAR activists will use bomb threats. For instance, Mexican activists of the ALF/ELF threatened to explode a car bomb at the United Nations Climate Change Conference (COP-16) in Cancun in December 2010, protesting the “environmentalist circus” of “green capitalism” and “friendly technology.”⁹⁴ However, a few weeks earlier the same group had actually put a homemade bomb inside the ATM area of a bank in Mexico State.⁹⁵ So far, Mexican ALF/ELF activists have been the only ones to include the use of real bombs into their action repertoire, perhaps a consequence of the violence so prevalent in (or endemic to) contemporary Mexico.⁹⁶ Their brothers and sisters in North America and Western Europe have only occasionally resorted to hoax bombings, mostly as part of the SHAC campaign.

Cybercrimes are the most recent addition to the arsenal of criminal acts of the REAR movement. They mostly involve mass mailings, cyberattacks, and credit card fraud. Mass mailings and credit card fraud are often combined, such as in the case of the 2009 action of the “Postal Annoyance Brigade,” which mailed thousands of dollars worth of magazine subscriptions and junk mail to ten “friends” from the fur industry.⁹⁷ Cyberattacks are directed at websites of firms linked to environmental destruction and animal rights abuse or e-mail accounts of their employees. For instance, in 2007 ALF activists in the United States deleted access to the website of Lagrange Capital Management for over 300 associates, declaring in its communiqué “your password wasnt [sic] hard to guess Grange, times up, sell your shares in Huntingdon Life Sciences.”⁹⁸

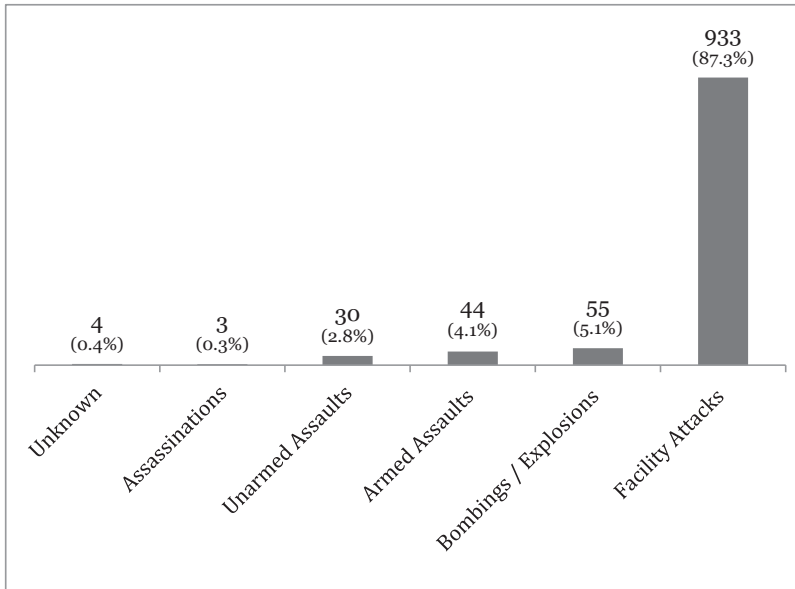


Figure 1. Criminal acts of the REAR movement in the United States, 1970–2007.

Obviously, animal liberations are much more widespread than bombings, let alone assassinations. Furthermore, radical environmentalists differ somewhat in their favorite choice of acts from radical animal rights activists,⁹⁹ while fairly significant national and regional differences exist within each sub-movement. Exact numbers are impossible to find. No cross-national database exists and even in the case of one country, such as the United States, the data are far from perfect. Despite all limitations listed by the authors, and the somewhat different categorization they use, the dataset of Carson and colleagues is the best available for the United States. Of the 1,069 criminal acts that the REAR movement perpetrated between 1970 and 2007 (see Figure 1), they categorized 3 as assassinations (0.3%), 44 as armed assaults (4.1%), 55 as bombings/explosions (5.1%), 933 as facility attacks (87.3%), 30 as unarmed assaults (2.8%), and 4 as unknown (0.4%).

As there is no cross-national dataset for criminal acts of the whole REAR movement, we developed an original global dataset of 5,578 criminal acts of the radical animal rights movement in the period 2003–2010. Given that animal rights activists are responsible for the vast majority of criminal acts of the broader REAR movement, and have a roughly similar pattern of activities as environmentalist activists,¹⁰⁰ the findings should be largely representative of the broader REAR movement. Following Flückiger,¹⁰¹ the dataset was constructed on the basis of the information posted on the website of *Bite Back* magazine. Using the categorization discussed above, we counted (see Figure 2) 247 acts of arsons (4.4%), 0 assassinations (0%), 3,695 of vandalism (66.2%), 808 house visits (14.5%), 690 animal liberations (12.4%), 80 bombs (1.4%), and 58 cybercrimes (1%).

Assessment

There has been much discussion among scholars about a working definition of terrorism, and many different ones have been offered. For example, a comprehensive literature review of

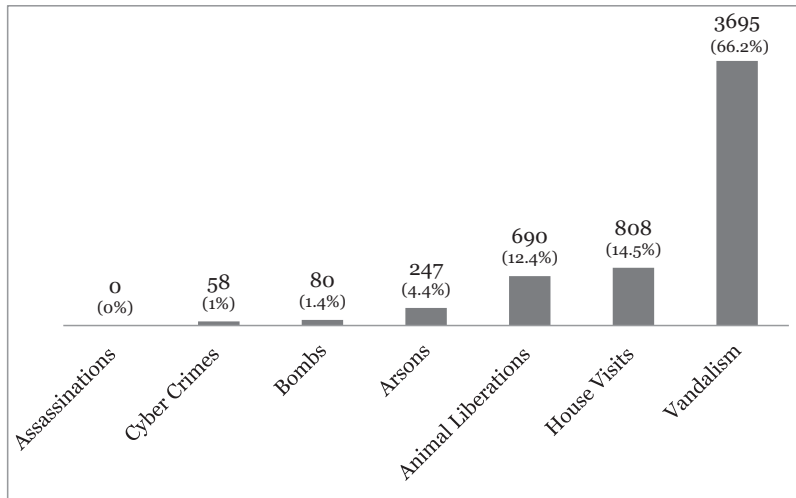


Figure 2. Criminal acts of the radical animal rights movement, 2003–2010.

major journals in the field (e.g., *Studies in Conflict and Terrorism*, *Terrorism*, and *Terrorism and Political Violence*) yielded a total of seventy-three distinctive definitions, drawn from fifty-five articles.¹⁰² A consensus definition employed by the contributors of these articles defined terrorism as follows: “A politically motivated tactic involving the threat or use of force or violence in which the pursuit of publicity plays a significant role.”¹⁰³

While this definition captures most features of terrorism, it does not really get to the root of the term (i.e., terror). Terrorism goes beyond mere political violence; terrorists *terrorize*. Essential to terrorism is a psychological process based on the power of fear, more specifically fear for the physical wellbeing of (a subset of) the population. Consequently, we define terrorism as *a strategy that employs the threat or use of force or violence to instill fear in (a subset of) the population with the ultimate aim of achieving political goals*. In the case of ecoterrorism, these political goals are the ending of environmental destruction and animal rights abuse. Having defined (eco)terrorism, we will now assess whether the different types of criminal acts of the REAR movement meet that definition.

The most straightforward positive case of terrorism is, of course, assassinations. They are the most obvious example of the use of violence against human beings. Moreover, because the assassinations are politically motivated, and victims are selected on the basis of political motivations, they instill fear in the subset of the population that meets those political motivations. The most straightforward negative case is animal liberations, which clearly do not constitute acts of terrorism. While pure animal liberations might create some economic costs (i.e. cutting fences and breaking locks), they do not instill fear, as there is no threat of force or violence to human beings. Similarly, vandalism and cyber-attacks, of and by themselves, do not meet the definition of terrorism, even if they could have a more direct personal impact, through the invading of privacy. Even tagging (i.e., spraying graffiti) at or mass mailing to a home address is not instilling fear, as long as it is not linked to other acts, which are (considered as) threatening to the targeted human beings.

This leaves three types of acts that are less clear-cut: arsons, bombings, and house visits. The case for arsons and bombings is pretty similar. In both cases the question

is whether the particular act can be considered threatening to the physical integrity of humans. For example, the aforementioned car bomb threat at the COP-16 in Mexico was clearly threatening to all humans inside the targeted building and therefore constitutes a terrorist act. However, the torching of a truck belonging to the municipal dog pound in Bariloche, Argentina, in May 2013, was not, because the arson was done in the night and the truck was not close to a private residence.¹⁰⁴

More problematic are the various cases of arson that target properties close to private residences and include thinly veiled threatening messages. For instance, in October 2012, Swedish ALF activists set fire to one of the cars of the owner of a fur store in Kumla. Not only was the car torched in front of the home of the target, the ALF included the following message: “This is just a warning of what is coming if you don’t end your involvement in the bloody skintrade [sic] NOW!!!.”¹⁰⁵ While the threat does not explicitly state *what* “is coming,” and the ALF officially rejects the use of physical violence (although the fairly similar ARM, also active in Sweden, does not), there is no doubt that most people will consider the combination of the act and the note threatening to their physical safety.

The last type of action, house visits, is even more complex, as it is often not only aimed at the actual target, but also at her friends and family. Many house visits are legal, such as demonstrating on public streets outside of a private residence. Others are illegal, but not necessarily threatening, such as demonstrations at a private residence. Even actions that expose (young) individuals to gruesome pictures of experiments on animals are not necessarily illegal or threatening. However, relatively harmless acts can become terrorist acts if they are accompanied with threatening messages. For example, the abovementioned house visit to an HLS employee, which included vandalism, was accompanied by the following message:

You can install all of the motion sensor lights in the world and it won’t make a difference. You’ve been marked. We’ve been watching you and Kevin following your trip overseas last April 19th. We’ve been in your house while in San Francisco. We’ve “bumped” into you at Costco. You’ve given us the time while in line at Bank of America. We’ve been watching your house. We’ve been watching you and your family. You’ve provided us with a wealth of information and amusement. But the fun can only last for so long. In consideration of Kevin being out of town so often, think of your family’s security as your windows could be put through tomorrow night. We won’t forget the animals you’ve helped murder at Huntingdon. Until you quit or until HLS closes, we’re bringing your work home for you.¹⁰⁶

So, where does this leave us with regard to the term ecoterrorism? First of all, there is no doubt that *certain acts* of the REAR movement are terrorist. Second, there are some groups within the movement that do not exclude terrorist acts—most notably ARM, Justice Department, ITS, and the ELA. However, despite ongoing radicalization within the movement, the vast majority of REAR activists and “groups” are not involved in terrorist acts. While it is difficult to exactly establish the proportion of terrorist acts within the total action repertoire of the REAR movement, based on the data presented above, less than 10 percent of all criminal actions of the movement can be categorized as ecoterrorist. It is important to remember, however, that these only refer to *criminal* acts of the movement, which themselves constitute only a minority of all acts of both the environmental and animal rights subculture in general, and the REAR movement in particular.

Moreover, the terrorist acts are not central to the political campaign of most individuals and groups of the REAR movement, which is aimed, essentially, at ending environmental destruction and animal rights abuse by making it financially unprofitable for businesses.

Conclusion

This article has critically assessed the political and academic debates about the meaning and use of the term ecoterrorism. We also provided an overview of the various actors involved in the REAR movement and analyzed the character and relevance of the movement's different types of criminal acts. Our firm conclusion is that the term does not apply to the vast majority of actions, individuals and groups of the REAR movement. We will here shortly discuss the consequences of this finding to the study of "big tent" radical movements in terrorism research in general, and the study of the REAR movement and "ecoterrorism" in particular.

As many protagonists of the REAR movement argue, every major social movement includes moderate and radical individuals and groups, including often a small violent (terrorist) minority. This was the case in, for example, both the recent anti-globalization movement and the historical civil rights movement. No one would classify these movements, as a whole, as terrorist. An excellent analogy is the U.S. anti-abortion movement, which includes a significant and very active radical wing that is involved in criminal acts and even political violence.¹⁰⁷ Unlike the REAR movement, academics, government agencies, or politicians hardly ever refer to the radical anti-abortion movement as terrorist. As Lovitz¹⁰⁸ notes, with clear disapproval, in a comparison of the AETA and FACE (Freedom of Access to Clinic Entrances) Act,

Despite the fact that lives have been lost as a result of anti-abortion activism and not a single life has been lost as a result of animal activism, the FACE Act is considerably tamer than the AETA, and penalties are significantly higher. A violator of the FACE Act will not have to face federal charges of terrorism.

In addition to these relatively unstructured social movements, a comparison to some complex formal organizations that are often labeled terrorist is also instructive. Two good examples of such organizations are Hamas and Hezbollah, which are both involved in many different political activities, from terrorist acts against Israeli targets to officially governing specific territories (the Gaza Strip and Lebanon, respectively). While Hamas features on the official terrorist lists of all major Western countries and organizations, Hezbollah does not.¹⁰⁹ Explicitly acknowledging its complex organizational structure, the EU does not include Hezbollah as such on its list of terrorist organizations, but only the military wing, reflecting the significance of the organization's political activities in Lebanese politics.¹¹⁰

The main difference between Hamas and Hezbollah, on the one hand, and the radical anti-abortion and REAR movements, on the other hand, is of course the organizational structure. While the former are centrally structured organizations with official members, in which one overarching leadership is ultimately responsible for all of the organization's actions, the latter are not. They are social movements that loosely encompass a broad variety of individuals, groups and organizations. While most condone and many participate in illegal activities, only a tiny minority engages in (truly) terrorist activity. Consequently, the label ecoterrorism should not be used for the whole REAR movement, but only for some of its actions, individuals and groups; this also holds for the most active "groups" within

the broader movement (i.e., ALF and ELF). Obviously, this also means that counterterrorist measures should only target these terrorist minorities, rather than the broader movement. Just as every radical anti-abortion activist is not a (potential) terrorist, neither is every radical environmentalist or animal rights activist.

Notes

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2. Federal Bureau of Investigation (FBI), "Terrorism Report 2002-2005." Available at http://www.fbi.gov/stats-services/publications/terrorism-2002-2005/terror02_05.pdf (accessed 27 October 2013), p. 41.

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4. For some early exceptions, see Rachel Monaghan, "Animal Rights and Violent Protest," *Terrorism and Political Violence* 9(4) (1997), pp. 106–116; Bron Taylor, "Religion, Violence and Radical Environmentalism: From Earth First! to the Unabomber to the Earth Liberation Front," *Terrorism and Political Violence* 10(4) (1998), pp. 1–42.

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6. Chantal de Jonge Oudraat and Jean-Luc Marret, "The Uses and Abuses of Terrorist Designation Lists," in Martha Crenshaw, ed., *The Consequences of Counterterrorism* (New York: Russell Sage Foundation, 2010), pp. 94–129.

7. Will Potter, *Green is the New Red: An Insider's Account of a Social Movement Under Siege* (San Francisco: City Lights, 2011), p. 55.

8. Ron Arnold, *Ecoterror: The Violent Agenda to Save Nature: The World of the Unabomber* (Bellevue, WA: Free Enterprise Press, 1997).

9. See also David Helvarg, *The War Against the Greens: The "Wise-Use" Movement, the New Right, and the Browning of America* (Boulder, CO: Big Earth Publishing, 2004).

10. Dara Lovitz, *Muzzling a Movement: The Effects of Anti-Terrorism Law, Money, and Politics on Animal Activism* (Brooklyn, NY: Lantern Books, 2010), pp. 50–53.

11. Lovitz, *Muzzling a Movement*; Potter, *Green is the New Red*.

12. Denise R. Case, "The USA PATRIOT Act: Adding Bite to the Fight against Animal Rights Terrorism?," *Rutgers Law Journal* 34 (2002–2003), pp. 187–233.

13. James Jarboe, "The Threat of Eco-Terrorism," *Testimony to the House Resources Committee, Subcommittee on Forests and Forest Health*, 2 February 2002. Available at <http://www.fbi.gov/news/testimony/the-threat-of-eco-terrorism> (accessed 4 April 2013).

14. Lovitz, *Muzzling a Movement*, p. 77.

15. One of those opponents is Senator Patrick Leahy (D-VT), who refused to attend the 2004 Senate Hearing "Animal Rights: activism vs. Criminality," writing in a statement: "Most Americans would not consider the harassment of animal testing facilities to be terrorism, any more than they would consider anti-globalization protestors or anti-war protestors or women health activists to be terrorists." In Lovitz, *Muzzling a Movement*, p. 59.

16. Rebecca K. Smith, "Ecoterrorism: A Critical Analysis of the Vilification of Radical Environmental Activists as Terrorists," *Environmental Law* 38 (2008), p. 537.

17. An excellent example is a recent op-ed in *Forbes* (10 July 2013), entitled "Domestic Eco-Terrorism Has Deep Pockets. And Many Enablers." Available at <http://www.forbes.com/sites/henrymiller/2013/07/10/domestic-eco-terrorism-has-deep-pockets-and-many-enablers> (accessed 27 October 2013).

18. Algemene Inlichtingen en Veiligheidsdienst (AIVD), *Disengagement en deradicalisering van jihadisten in Nederland* (The Hague, AIVD, 2010), p. 4. For an academic analysis of the British discussion, see Rachel Monaghan, "Not Quite Terrorism: Animal Rights Extremism in the United Kingdom," *Studies in Conflict & Terrorism* 36(11) (2013), pp. 933–951.

19. See, for example, Walter Laqueur, *No End to War: Terrorism in the Twenty-First Century* (London: Continuum, 2003); Richard English, *Terrorism: How to Respond* (Oxford: Oxford University Press, 2010); Andrew T. H. Tan, ed., *Politics of Terrorism: A Survey* (London: Routledge, 2010).

20. See, for example, David C. Rapoport and Leonard Weinberg, *Democratic Experience and Political Violence* (London: Frank Cass, 2001).

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23. Rachel Monaghan, "Single-Issue Terrorism: A Neglected Phenomenon?," *Studies in Conflict & Terrorism* 23(4) (2000), pp. 255–265; William C. Banks, Renée de Nevers, and Mitchel B. Wallerstein, *Combating Terrorism: Strategies and Approaches* (Washington, DC: CQ Press, 2008), pp. 50–51; Gus Martin, *Understanding Terrorism: Challenges, Perspectives, and Issues* (Thousand Oaks, CA: Sage, 2012), pp. 433–434.

24. See, for example, Shannon O'Lear, "Environmental Terrorism: A Critique," *Geopolitics* 8(3) (2003), pp. 127–150; Steve Vanderheiden, "Radical Environmentalism In an Age of Antiterrorism," *Environmental Politics* 17(2) (2008), pp. 299–318; Randall Amster, "Perspectives on Ecoterrorism: Catalysts, Conflations, and Casualties," *Contemporary Justice Review* 9(3) (2006), pp. 287–301; Hrair R. Dekmejian, *Spectrum of Terror* (Washington, DC: CQ Press, 2007), p. 310.

25. See, most notably, the pioneering work by Rachel Monaghan, including "Animal Rights and Violent Protest" and "Not Quite Terrorism." On radical groups within the British animal rights movement, see John Donovan and Richard T. Coupe, "Animal Rights Extremism: Victimization, Investigation and Detection of a Campaign of Criminal Intimidation," *European Journal of Criminology* 10(1) (2013), pp. 113–132; Gordon Mills, "The Successes and Failures of Policing Animal Rights Extremism in the UK 2004–2010," *International Journal of Police Science and Management* 15(1) (2013), pp. 30–44.

26. Sean P. Eagan, "From Spikes to Bombs: The Rise of Eco-Terrorism," *Studies in Conflict and Terrorism* 19(1) (1996), pp. 1–18.

27. Exceptions include Bron Raymond Taylor, *The Encyclopedia of Religion and Nature* Vol. 2 (London and New York: Thoemmes Continuum, 2005); Vanderheiden, "Eco-Terrorism or Justified Resistance?"; Don Liddick, *Eco-Terrorism: Radical Environmental and Animal Liberation Movements* (Westport, CT: Greenwood, 2006); Rik Scarce, *Eco-Warriors: Understanding the Radical Environmental Movement* (Walnut Creek, CA: Left Coast Press, 2006, updated edition).

28. See, for example, Amster, "Perspectives on Ecoterrorism"; Jared S. Goodman, "Shielding Corporate Interests from Public Dissent: An Examination of the Undesirability and Unconstitutionality of Eco-Terrorism Legislation," *Journal of Law and Policy* 16(2) (2008), p. 823; Joseph E. Roeschke, "Eco-Terrorism and Piracy on the High Seas: Japanese Whaling and the Rights of Private Groups to Enforce International Conservation Law in Neutral Waters," *Villanova Environmental Law Journal* 20 (2009), p. 99.

29. Taylor, "Religion, Violence and Radical Environmentalism"; Amster, "Perspectives on Ecoterrorism"; Jennifer Varriale Carson, Gary LaFree, and Laura Dugan, "Terrorist and Non-Terrorist Criminal Attacks by Radical Environmental and Animal Rights Groups in the United States, 1970–2007," *Terrorism and Political Violence* 24(2) (2012), pp. 295–319.

30. For example, Luther G. Tweeten, *Terrorism, Radicalism, and Populism in Agriculture* (Ames: Iowa State Press, 2003); Liddick, *Eco-Terrorism*.

31. See, for example, Michael Gold-Biss, *The Discourse on Terrorism: Political Violence and the Subcommittee on Security and Terrorism, 1981–1986* (New York: Peter Lang, 1994); Gary

A. Ackerman, "Beyond Arson? A Threat Assessment of the Earth Liberation Front," *Terrorism and Political Violence* 15(4) (2003), pp. 143–170; Carson et al., "Terrorist and Non-Terrorist Criminal Attacks."

32. Taylor, "Religion, Violence and Radical Environmentalism"; Ackerman, "Beyond Arson?"; Carson et al., "Terrorist and Non-Terrorist Criminal Attacks."

33. For example, Steven Best and Anthony J. Nocella, eds., *Terrorists or Freedom Fighters?: Reflections on the Liberation of Animals* (Herndon, VA: Lantern Books, 2004); Vanderheiden, "Eco-Terrorism or Justified Resistance?"; Amster, "Perspectives on Ecoterrorism."

34. Dave Foreman and Bill Haywood, *Ecodefense: A Field Guide to Monkeywrenching* (Chicago, CA: Abbzug Press, 1993), p. 9.

35. Rosemary H. O'Kane, *Terrorism* (Harlow: Pearson, 2012, 2nd edition), p. 22.

36. See, for example, Jenny Teichman, "How to Define Terrorism?," *Philosophy* 64(250) (1989), pp. 505–517; Taylor, "Religion, Violence and Radical Environmentalism"; Amster, "Perspectives on Ecoterrorism"; Travis Wagner, "Reframing Ecotage as Ecoterrorism: News and the Discourse of Fear," *Environmental Communication* 2(1) (2008), pp. 25–39.

37. Monaghan, "Single-Issue Terrorism."

38. Dan Oko, "Ecoterrorists Under Fire," *MotherJones*, 8 February 2002. Available at <http://www.motherjones.com/politics/2002/02/ecoterrorists-under-fire> (accessed 27 October 2013).

39. Scarce, *Eco-Warriors*, p. 54.

40. Tweeten, *Terrorism, Radicalism, and Populism in Agriculture*, p. 100

41. Liddick, *Eco-Terrorism*.

42. See, for example, David Miller, *Anarchism* (London: Dent, 1984); Taylor, "Religion, Violence and Radical Environmentalism"; Monaghan, "Single-Issue Terrorism."

43. Vanderheiden, "Eco-Terrorism or Justified Resistance?"; Amster, "Perspectives on Ecoterrorism."

44. For example, Liddick, *Eco-Terrorism*.

45. Ackerman, "Beyond Arson?"

46. Alex P. Schmidt and Albert I. Jongman, *Political Terrorism* (Amsterdam: North-Holland Publishing Company, 1988, 2nd edition); Mark Juergensmeyer, *Terror in the Mind of God: The Global Rise of Religious Violence* (Berkeley, CA: University of California Press, 2003); Paul Rogers, "Terrorism," in Paul Williams, ed., *Security Studies: An Introduction* (London: Routledge, 2008), pp. 171–184.

47. Liddick, *Eco-Terrorism*.

48. Jim Spencer, "FBI Files Show Few Limits on Investigations," *Denver Post*, 1B, 23 December 2005. Available at http://www.denverpost.com/spencer/ci_3335785 (accessed 9 January 2014).

49. For some recent conceptually aware exceptions, see Monaghan, "Not Quite Terrorism"; David Thomas Sumner and Lisa M. Weidman, "Eco-Terrorism or Eco-Tage: An Argument for the Proper Frame," *Interdisciplinary Studies in Literature and Environment* 20(4) (2014), pp. 855–876.

50. Ackerman, "Beyond Arson?," p. 188.

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52. These quotes are part of the ALF credo, published (among others) on the official ALF website at http://www.animalliberationfront.com/ALFront/alf_credo.htm (accessed 9 January 2014).

53. Gus Martin, *The SAGE Encyclopedia of Terrorism* (Thousand Oaks, CA: Sage, 2011, 2nd edition), p. 44.

54. See Ingrid E. Newkirk, *Free the Animals: The Amazing True Story of the Animal Liberation Front* (Herndon, VA: Lantern Books, 1992).

55. Christopher Manes, *Green Rage* (Boston, MA: Little, Brown & Company, 1990).

56. Taylor, *The Encyclopedia of Religion and Nature*, p. 1327.

57. Manes, *Green Rage*.

58. Liddick, *Eco-Terrorism*, p. 56.

59. Taylor, "Religion, Violence and Radical Environmentalism," p. 20; Noel Molland, "The Spark That Ignited the Flame," in Stephen Best and Anthony Nocella, eds., *Igniting a Revolution: Voices in Defense of the Earth* (Oakland, CA: AK Press, 2006), pp. 47–58.
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64. Ackerman, "Beyond Arson?"
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75. George Michael, *Lone Wolf Terror and the Rise of Leaderless Resistance* (Nashville, TN: Vanderbilt University Press, 2012).
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77. Liddick, *Eco-Terrorism*, p. 40.
78. Scarce, *Eco-Warriors*, p. 121.
79. Watson, "The Terrorist Threat Confronting the United States."
80. Carson et al., "Terrorist and Non-Terrorist Criminal Attacks."
81. Ibid.
82. Jean-Marc Flükiger, "An Appraisal of the Radical Animal Liberation Movement in Switzerland: 2003 to March 2007," *Studies in Conflict & Terrorism* 31(2) (2008), pp. 145–157.
83. *Bite Back* is, both internally and externally, seen as "the News magazine about the radical animal rights movement worldwide." The information on the website is mostly provided directly by activists and has not been corroborated by other sources (be it media or law enforcement).
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85. "Animal Rights Militia Target Mink Farm Accountant," *Bite Back Magazine*, 5 April 2013. Available at http://www.directaction.info/news_apr05_13.htm (accessed 27 October 2013).
86. Liddick, *Eco-Terrorism*, p. 104.
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107. See, for example, Dallas A. Blanchard, *The Anti-Abortion Movement and the Rise of the Religious Right: From Polite to Fiery Protest* (New York: Twayne Publishers, 1994).
108. Lovitz, *Muzzling a Movement*, p. 98.
109. See de Jonge Oudraat and Marret, "The Uses and Abuses of Terrorist Designation Lists."
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